

BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-5300

Guy M. Hicks
General Counsel

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September 18, 2001

615 214 6301
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VIA HAND DELIVERY

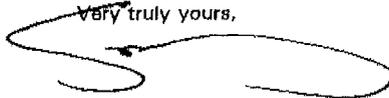
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Motion to Amend
Procedural Order. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*

Docket No. 97-00309

BELLSOUTH'S MOTION TO AMEND
PROCEDURAL ORDER

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Motion to Amend Procedural Schedule to request that proceedings on all remaining 271 issues be consolidated into one hearing to be held on or about February 18, 2002. BellSouth respectfully shows the Hearing Officer as follows:

On July 30, 2001, BellSouth filed its Section 271 Application with the Authority. On August 10, 2001, the Hearing Officer issued an Initial Order which, among other things, bifurcated the 271 hearings in the interest of judicial economy and efficiency. This action was apparently taken to expedite the 271 hearing, although no party had requested bifurcation of the 271 hearings.

On September 10, 2001 the Hearing Officer issued an Initial Order which clarified the Phase I issues in this matter. On September 14, 2001, BellSouth filed its Motion to Amend Procedural Schedule requesting that the Hearing Officer cancel the hearing scheduled for October 3 and move the Track A, Section 272 and public interest issues to the week of November 5, which the Hearing Officer previously asked the parties to reserve. BellSouth further requested that the

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Hearing Officer temporarily defer consideration of the remainder of the section 271 issues (including suspension of testimony filings) until after January 1, 2002.

On September 17, 2001, the Hearing Officer issued his Initial Order Resolving Discovery Disputes and Suspending Procedural Schedule. This Initial Order, in part, "[continued] all dates in this proceeding .. pending completion of discovery." Footnote 36 of the Initial Order stated: "[g]iven this Initial Order, BellSouth Telecommunications, Inc.'s Motion to Amend Procedural Schedule, filed September 14, 2001, is rendered moot."

Given the September 17, 2001 Initial Order and in consideration of several factors explained below, BellSouth files this Motion and requests that the Hearing Officer

1. cancel the hearings scheduled for October 3 and November 5 (presently continued pending completion of discovery) and move the Track A and public interest issues to a hearing on or about February 18, 2002, and
2. consolidate the remaining 271 issues on BellSouth's compliance with the 14-point checklist into the requested hearings on or about February 18, 2002.¹

BellSouth makes this proposal based on several factors. First, BellSouth believes that the Tennessee 271 proceeding should run parallel with the Authority's

¹ BellSouth further proposes that the parties discuss and jointly propose to the Hearing Officer new dates for the filing of testimony for these consolidated issues

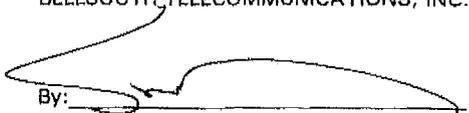
OSS proceedings BellSouth anticipates that Phase II hearings in the Tennessee OSS proceeding will likely take place in late January or February, 2002. Moving the 271 proceeding will keep the proceedings in parallel.

Second, this schedule would allow the Authority to complete Phase II of the OSS hearings prior to completion of the Tennessee 271 proceedings. Further, given the additional time this schedule would afford to the Authority, Staff and parties, bifurcation of 271 hearings is now unnecessary. A single 271 hearing in February would avoid having to coordinate schedules and filing dates for additional hearings and would allow the Authority to hear all remaining 271 issues during one hearing. Adopting this schedule would promote judicial economy and better allocation of resources.

For these reasons, BellSouth respectfully requests that the Authority (1) consolidate the 271 issues into one hearing; (2) move the 271 hearing to on or about February 18, 2002; and (3) extend the discovery schedule set in the Initial Order by 30 days.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By: 

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BellSouth Telecommunications, Inc.
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Guy M. Hicks
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September 14, 2001

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VIA HAND DELIVERY

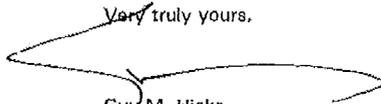
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Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

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BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA Service) in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*

Docket No. 97-00309

**BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION
TO AMEND PROCEDURAL SCHEDULE**

BellSouth Telecommunications, Inc. ("BellSouth") hereby moves the Hearing Officer to amend the procedural schedule in the above-styled matter in light of the Hearing Officer's September 10, 2001, Order. BellSouth respectfully shows the Hearing Officer as follows

On July 30, 2001, BellSouth filed its Section 271 Application with the Authority. BellSouth did not file testimony on section 272 or on public interest for the reasons set forth in its August 26, 2001 Motion for Clarification. On September 10, 2001, the Hearing Officer issued an Initial Order that clarified the Phase I issues in this matter. As part of the September 10, 2001 Order, the Hearing Officer held that he would consider BellSouth's compliance with section 272 as well as the public interest in the hearing scheduled for October 3, 2001. In accordance with that conclusion, the Hearing Officer gave BellSouth until September 14, 2001 to supplement its testimony.

Given the events of this week, the ordered timeline, and BellSouth's limited regulatory resources, BellSouth regretfully will not be able to comply with this schedule with the level of care and quality that it deems necessary. Further, given

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KY Case No. 2001-105
AT&T's Motion to Continue October 22, 201 Section 271
Hearing
Exhibit 2

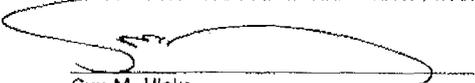
the representations that BellSouth will not ask this Authority to hear this matter prior to an FCC decision in the Georgia 271 case¹, BellSouth requests

1. Initially, that the Hearing Officer cancel the hearings scheduled for October 3, and move the Track A, section 272 and public interest issues to the week of November 5, which the Hearing Officer previously asked the parties to reserve, and
2. that the Hearing Officer temporarily defer consideration of the remainder of the section 271 issues (including suspension of testimony filings) until after January 1, 2002.

As to subparagraph 1 above, BellSouth further requests that it be granted additional time to file testimony on the section 272 and public interest issues. Specifically, BellSouth requests that it be granted until October 1, 2001, to file its direct testimony on these issues, and the CLECs be given until October 22, 2001, to file rebuttal testimony on these issues.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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Joelle Phillips
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(615) 214-6301

¹ The Georgia Public Service Commission has announced that it will vote on BellSouth's 271 application on October 3, 2001.

Fred McCallum, Jr.
Lisa Foshee
675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375

Attachment 3

DATE: September 12, 2001
TO: William D. Talbott, Executive Director
FROM: Division of Regulatory Oversight (Hoppe, Harvey)
Division of Competitive Services (D'Haeseleer, Simmons)
Division of Legal Services (B. Keating)
RE: Florida Third-Party Testing of BellSouth's Operational Support Systems (OSS)

CRITICAL INFORMATION: Please place on the September 18, 2001 Internal Affairs

During the September 18, 2001 Internal Affairs, staff and KPMG would like to provide a short briefing on the status of BellSouth OSS third-party testing. Attached is a handout detailing the status of evaluation criteria, observations and exceptions.

LSH/bjm

Attachment

cc: Dan Hoppe
Walter D'Haeseleer
Bill Lowe
Beth Salak
Beth Keating
Sally Simmons

**Florida OSS Testing of BellSouth
Status of Evaluation Criteria
as of September 12, 2001**

Domain/Test	Total Evaluation Criteria	Total Eval Criteria Currently Passing	Total Eval Criteria Currently Failing/Retesting	Total Eval Criteria Under Evaluation	Percent Currently Passing	Percent Currently Fail/Retesting	Percent Currently Under Evaluation
PMR1 Data Collection	48	24	0	24	50%	0%	50%
PMR2 Metric Definitions	574	562	12	0	98%	2%	0%
PMR3 Metric Change Mgt	7	0	4	3	0%	57%	43%
PMR4 Data Integrity	140	40	0	100	29%	0%	71%
PMR5 Metric Calculations	328	303	9	16	92%	3%	5%
TVV4 Provisioning Verification	23	0	0	23	0%	0%	100%
TVV5 TAFI Functional	16	16	0	0	100%	0%	0%
TVV6 ECTA Functional	14	11	0	3	79%	0%	21%
TVV7 TAFI Performance	9	9	0	0	100%	0%	0%
TVV8 ECTA Performance	20	10	10	0	50%	50%	0%
TVV9 End-to-End Trouble Rpt	35	35	0	0	100%	0%	0%
PPR6 Collocation	17	17	0	0	100%	0%	0%
PPR9 Provisioning Process	82	66	0	16	80%	0%	20%
PPR14 End-to-End M&R	16	15	1	0	93.75%	6.25%	0%
PPR15 M&R Work Centers	19	19	0	0	100%	0%	0%
PPR16 Network Surveillance	6	6	0	0	100%	0%	0%
PPR1 Change Management	8	2	5	1	25%	62.5%	12.5%
PPR2 Account Establishment	17	8	1	8	47%	6%	47%
PPR3 Interface Help Desk	13	2	5	6	15%	39%	46%
PPR4 CLEC Training	14	14	0	0	100%	0	0
PPR5 Interface Development	23	5	1	17	22%	4%	74%
TVV1 POP Functional	100	0	30	70	0%	30%	70%
TVV2 POP Volume	37	0	13	24	0%	35%	65%
TVV3 Flow Through	20	0	4	16	0%	20%	80%
PPR7 POP Manual Ordering	14	12	1	1	86%	7%	7%
PPR8 POP Work Center	21	13	2	6	62%	9.5%	28.5%
TVV10 Billing Functional	6	4	2	0	66.6%	33.4%	0%
TVV11 Carrier Bill Evaluation	20	13	3	4	65%	15%	20%
PPR10 Billing Work Center	19	18	1	0	95%	5%	0%
PPR12 Daily Usage Production	16	16	0	0	100%	0%	0%
PPR13 Bill Production	44	43	1	0	98%	0	2%

**Florida OSS Testing of BellSouth
Status of Observations and Exceptions
as of September 12, 2001**

OSS Observations			
	Total	Open	Closed
Performance Metrics	36	6	30
Repair, Provisioning and Maintenance	24	7	17
Relationship Management Infrastructure	10	3	7
Order Management	38	20	18
Billing	8	2	6
Total	116	38	78

Observations are potential deficiencies in BellSouth's OSS or a defect that hinders test execution.

OSS Exceptions			
	Total	Open	Closed
Performance Metrics	14	8	6
Repair, Provisioning & Maintenance	8	6	2
Relationship Management Infrastructure	19	7	12
Order Management	54	33	21
Billing	13	10	3
Total	108	64	44

Exceptions identify a deficiency that may result in a "not satisfied" condition in the final report if not remedied.